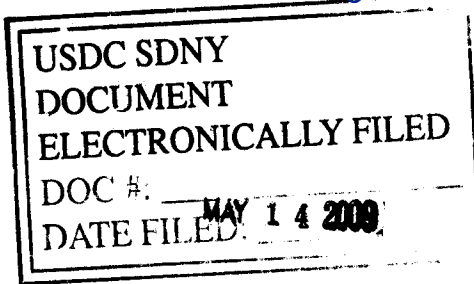


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA

- v. -

ALEXIS FREDDY MOSQUERA-RENTERIA,

a/k/a "Ronald,"

a/k/a "Ronald,"

YARLEI BAÑOL-RAMOS,

a/k/a "Diana," and

JORGE ABEL IBARGUEN-PALACIO,

a/k/a "Turbo,"

INDICTMENT

09 Cr.

**09 CRIM 498**

Defendants.

COUNT ONE

(Conspiracy to Provide Material Support or Resources  
To A Foreign Terrorist Organization)

The Grand Jury charges:

1. From at least in or about October 2007, up to and including on or about February 22, 2008, in an offense in and affecting interstate and foreign commerce, begun and committed outside of the jurisdiction of any particular State or District of the United States, ALEXIS FREDDY MOSQUERA-RENTERIA, a/k/a "Ronald," a/k/a "Ronald," YARLEI BAÑOL-RAMOS, a/k/a "Diana," and JORGE ABEL IBARGUEN-PALACIO, a/k/a "Turbo," the defendants, who were first brought to and arrested in the Southern District of New York, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate and agree together and with each other to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), to a foreign terrorist organization, to wit, the FARC,

which was designated by the United States Secretary of State as a foreign terrorist organization in October 1997, pursuant to Section 219 of the Immigration and Nationality Act; which has remained on the list of designees since that time; whose most recent designation as a foreign terrorist organization was executed November 18, 2008, and which is currently designated as such, as of the date of filing of this Indictment.

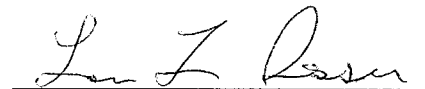
2. It was a part and an object of the conspiracy that ALEXIS FREDDY MOSQUERA-RENTERIA, a/k/a "Ronald," a/k/a "Ronal," YARLEI BAÑOL-RAMOS, a/k/a "Diana," and JORGE ABEL IBARGUEN-PALACIO, a/k/a "Turbo," the defendants, and others known and unknown, would and did provide the FARC with personnel (including themselves) and supplies (including communications equipment, weapons, and explosives), and other support and resources, knowing that the FARC had engaged and was engaging in terrorist activity (as defined in section 212(a)(3)(B) of the Immigration and Nationality Act), and knowing that the FARC had engaged and was engaging in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), in violation of Title 18, United States Code, Section 2339B.

OVERT ACT

3. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed:

a. On or about February 22, 2008, off the coast of Panama, traveling in a boat that had been used to transport cocaine, ALEXIS FREDDY MOSQUERA-RENTERIA, a/k/a "Ronald," a/k/a "Ronald," YARLEI BAÑOL-RAMOS, a/k/a "Diana," and JORGE ABEL IBARGUEN-PALACIO, a/k/a "Turbo," the defendants, forcibly boarded a Panamanian police patrol boat and held Panamanian police officers at gunpoint, and subsequently engaged in a shootout with other Panamanian police, shooting one police officer in the face.

(Title 18, United States Code,  
Sections 2339B(a)(1), (d)(1) and 3238).

  
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FOREPERSON  
\_\_\_\_\_  
LEV L. DASSIN  
Acting United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

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JORGE ABEL IBARGUEN-PALACIO,  
a/k/a "Turbo,"

Defendants.

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INDICTMENT

09 Cr.

(18 U.S.C. § 2339B)


Lev L. Dassin  
Acting United States Attorney.

  
A TRUE BILL

\_\_\_\_\_  
Foreperson.

*F. A. H. J.*

*Filed Judson A*

  
*5/14/09*